

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

**PLAINTIFFS' NOTICE OF DAUBERT MOTION TO EXCLUDE THE  
TESTIMONY OF DEFENSE EXPERT JON P. FRYZEK, MPH, PH.D.**

**TO:** Seth A. Goldberg, Esq.  
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Philadelphia, Pennsylvania 19103-4196  
*Attorneys for Defendants*

**PLEASE TAKE NOTICE** that pursuant to Case Management No. 23 Revised, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4<sup>th</sup> and Cooper Streets, Camden, New Jersey, for an Order Excluding the Testimony of Jon P. Fryzek, MPH, Ph.D.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs shall rely upon the Brief and Certification of C. Brett Vaughn in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**HOLLIS LAW FIRM**  
Attorneys for Plaintiffs

By: /s/ C. Brett Vaughn

Dated: November 1, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2021, I electronically filed the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing documents will be served contemporaneous to filing via email on the Court, Special Master, and the Defense Executive Committee at [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com).

**HOLLIS LAW FIRM**  
Attorneys for Plaintiffs

Dated: November 1, 2021

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